



ORIGINAL

Coalition for

Sonoran Desert Protection

OPEN MEETING AGENDA ITEM

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Arizona Corporation Commission

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in the Public Interest

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Bat Conservation
International

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Center for Environmental
Connections

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Ethics

Defenders of Wildlife
Desert Watch

Empire Fagan Coalition

Environmental and Cultural
Conservation Organization

Environmental Law Society

Friends of Cabeza Prieta

Friends of Ironwood Forest

Friends of Madera Canyon

Friends of Saguaro National
Park

Friends of Tortolita

Gates Pass Area
Neighborhood Association

Genius Loci Foundation

Native Seeds / SEARCH

Northwest Neighborhood
Alliance

Protect Land and
Neighborhoods

Safford Peak Watershed
Education Team

Save the Scenic Santa Ritas

Sierra Club - Grand Canyon
Chapter

Sierra Club - Rincon Group

Sky Island Alliance

Sky Island Watch

Society for Ecological
Restoration

Sonoran Permaculture
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Southwestern Biological
Institute

Tortolita Homeowners
Association

Tucson Audubon Society

Tucson Herpetological
Society

Tucson Mountains
Association

Wildlands Network

Women for Sustainable
Technology

Arizona Corporation Commission

Commissioners Wing

1200 West Washington

Phoenix, AZ 85007-2996

**RE: Certificate of Environmental Compatibility for the SunZia Southwest Transmission
Line Project**

**Docket No. L-00000YY-15-0318-
00171**

Dear Commissioners,

The Coalition for Sonoran Desert Protection urges you to deny a Certificate of Environmental Compatibility for the SunZia Southwest Transmission Line Project and the proposed route for this transmission line through the San Pedro River Valley at your meeting on February 2 and 3, 2016.

We are an alliance of 35 conservation and community groups based in Tucson, AZ and established in 1998. We work to achieve the long-term conservation of biological diversity and ecological function of the Sonoran Desert through comprehensive land-use planning, with primary emphasis on Pima County's Sonoran Desert Conservation Plan.

As part of its ground-breaking Sonoran Desert Conservation Plan, Pima County has protected over 200,000 acres of natural open space over the last 18 years, including the Six Bar Ranch (3,292 acres of fee simple lands and 9,000 acres of state grazing leases) and the A7 Ranch (6,829 acres of fee simple lands and 34,195 acres of state grazing leases) in the San Pedro River Valley. These properties are home to a wide diversity of vulnerable Sonoran Desert wildlife species, including the long-fin dace, lowland leopard frog, Abert's towhee, lesser long-nosed bat, Mexican long-tongued bat, Western red bat, ocelot, Sonoran Desert tortoise, cactus ferruginous pygmy owl, Mexican spotted owl, Southwest willow flycatcher, and the Giant spotted whiptail, among others.

As part of its Conservation Lands System, a science-based land-use planning map and related policies, Pima County has identified Important Riparian Area (recommended 95% open space), Biological Core Management Area (recommended 80% open space), and Multiple Use Management Area (recommended 66 2/3 % open space) on these two properties. These three categories represent the three most biologically important land categories in the Conservation Lands System. These ranches also provide critical wildlife corridor lands for wildlife movement across and through the San Pedro River Valley between the Santa Catalina, Rincon, Galiuro Mountains, and points south and north.

The proposed SunZia Southwest Transmission Line Project would threaten the considerable public investment in these open space lands and the unique natural resources of the greater San Pedro River Valley.

The San Pedro River Valley itself is also a globally significant bird migration corridor and home to rare, threatened, and endangered bird species, including the Western Yellow-billed Cuckoo, Mexican Spotted Owl, and the Southwestern Willow Flycatcher. The proposed route for the SunZia project could irreparably harm these species and their habitat forever.

When deliberating the issuance of a Certificate of Environmental Compatibility, the law requires "special consideration to the protection of areas unique because of biological wealth or because they are habitats for rare and endangered species." There is no doubt the San Pedro River Valley, and Pima County's conservation lands in this area, are both biologically wealthy and contain habitat for rare and endangered species.

Thank you for considering our comments on this proposal.

Sincerely,

A handwritten signature in black ink, reading "Carolyn Campbell". The signature is written in a cursive, flowing style.

Carolyn Campbell
Executive Director